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COUNSEL FOR DEFENDANTS

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
HELENA DIVISION

DOUG LAIR, STEVE DOGIAKOS,
AMERICAN TRADITION PARTNERSHIP,
AMERICAN TRADITION PARTNERSHIP
PAC, MONTANA RIGHT TO LIFE
ASSOCIATION PAC, SWEETGRASS
COUNCIL FOR COMMUNITY
INTEGRITY, LAKE COUNTY
REPUBLICAN CENTRAL COMMITTEE,
BEAVERHEAD COUNTY REPUBLICAN
CENTRAL COMMITTEE, JAKE OIL, LLC,
JL OIL, LLC, CHAMPION PAINTING,
INC., and JOHN MILANOVICH,

Plaintiffs,

v.

JONATHAN MOTL, in his official capacity
as Commissioner of Political Practices;
TIM FOX, in his official capacity as
Attorney General of the State of Montana; and
LEO GALLAGHER, in his official capacity
as Lewis and Clark County Attorney,

Defendants.

CV 12-12-H-CCL

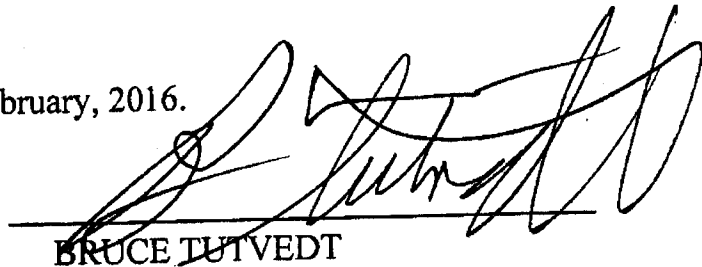
**DECLARATION OF BRUCE
TUTVEDT**

I, Bruce Tutvedt, hereby declare as follows:

1. I am over the age of eighteen years, am competent to testify to the matters set forth herein, and I make this Declaration based upon my own personal knowledge and belief.
2. I am a Republican member of the Montana State Senate.
3. During the 2009 session, I attended a meeting of Republican senators in Helena, Montana.
4. At the meeting, another senator addressed the group and informed us that if we promised to introduce a right-to-work bill and get a vote of record in the 2011 session, then the National Right to Work group would make \$100,000 available for the Republican Legislative Campaign Committee, which is made up of legislators from both the House and Senate, to elect Republican majorities to the Montana Legislature in the 2012 election cycle.
5. Based upon that presentation, my understanding was that if Republican legislators promised to introduce a right-to-work bill and get a vote of record in both houses, then the Republican Legislative Campaign Committee would receive in exchange \$100,000 with more available if needed to elect Republican majorities to the Montana House and Senate.
6. After a brief discussion, the offer was rejected.

7. I hereby declare under penalty of perjury under the laws of the United States of America and the State of Montana that the foregoing is true and correct.

DATED this 22nd day of February, 2016.



BRUCE TUTVEDT

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing document with the clerk of the court for the United States District Court for the District of Montana, using cm/ecf system.

Participants in the case who are registered cm/ecf users will be served by the cm/ecf system.

Dated: March 28, 2016

/s/ Matthew T. Cochenour

MATTHEW T. COCHENOUR
Assistant Attorney General
Counsel for Defendants